

January 22, 2002

The Honorable Michael K. Powell  
Chairman  
Federal Communications Commission  
445 Twelfth Street, S.W., Suite TW-A325  
Washington, D.C. 20554

Re: Joint Competitive Industry Group Proposal Regarding Performance  
Metrics and Installation Intervals for Interstate Special Access Services

Dear Chairman Powell:

The undersigned competitive telecommunications carriers, trade associations and the eCommerce & Telecommunications Users Group (eTUG) (the "Joint Competitive Industry Group") urge the Commission to adopt performance measures, performance standards, and reporting requirements to govern the provision of special access services by incumbent local exchange carriers (LECs). Since release of the Commission's Notice of Proposed Rulemaking in this proceeding, the Joint Competitive Industry Group has devoted considerable time and effort to the development of a coherent, practical, and enforceable set of such measures, standards and reporting requirements. The results of that effort are reflected in the attached Performance Measurements & Standards applicable to the provision of all interstate special access services by Tier 1/Class A incumbent LECs (Attachment A), as well as the attached proposal regarding Offered Installation Intervals (Attachment B).

The Joint Competitive Industry Group believes that its proposal accomplishes the following objectives:

- (1) A united competitive industry and user group view regarding the best way to achieve the quality of special access provisioning required to serve business customers;
- (2) A concise set of metrics that will induce proper provisioning and deter discrimination by incumbent LECs;
- (3) A set of metrics that can easily be incorporated into a remedy plan.

The Joint Competitive Industry Group therefore urges the Commission to adopt the Group's proposal regarding performance metrics and installation intervals.

Sincerely,

**The Joint Competitive Industry Group**

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Attachments

cc: Commissioner Abernathy  
Commissioner Copps  
Commissioner Martin  
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Uzoma Onyeije  
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